

Hazardous Waste: Your Business Responsibilities

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P.O. Box 7921
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Small Quantity Generator Basic Requirements

Many businesses find it difficult to juggle their daily affairs and still have time to keep up with the regulations that affect them. This brief publication, though not a substitute for reading the actual regulations, may help businesses **responsibly manage small quantities of hazardous waste.***

First make sure your waste is indeed hazardous, by using your knowledge about the waste you generate, or by having your waste tested by a certified laboratory. If your waste is hazardous; if you generate more than 220 pounds but less than 2,205 pounds every month; and if you don't exceed this amount in any one month, your business is considered to be a "Small Quantity Generator" (SQG). (Never accumulate more than 13,230 pounds. Use this rule of thumb to estimate how much waste you generate: Two hundred twenty (220) pounds of liquid waste is approximately half of a 55-gallon drum.)

While accumulating waste, small quantity generators are required to do the following:

- Notify DNR that you are a SQG of hazardous waste and apply for an EPA identification number**.

- Keep track of how much waste you produce.
- SQGs should never accumulate more than 13,230 pounds (roughly equal to 26 55-gallon drums) of hazardous waste on-site at any time. SQGs who either exceed the monthly generation limits or on-site accumulation quantities become subject to more stringent regulations.
- Keep the lid on drums when you are not removing or adding waste to them.
- Label your drums to indicate that they contain hazardous waste.
- Mark each drum with the date that you first place hazardous waste in it. SQGs must make arrangements for proper shipping within 180 days of when the waste is generated. Time extensions may be available. For waste being stored in satellite locations, the requirements are slightly different.***
- Each week, inspect the areas where hazardous waste is stored. Ensure that the containers are stored according to requirements. Containers should be properly closed and labeled, with no leaks. Log these weekly inspections in an inspection record.
- Fill out annual DNR reports.
- Designate an emergency coordinator and post emergency contact information next to all telephones.
- Develop an internal training program on safe management practices.
- Keep copies of all records for three years. These include, but may not be limited to, waste determinations, manifest copies, LDR forms, weekly inspections, and annual reports.

Remember, a small generator may not accumulate waste for more than 180 days from generation or accumulate more than 13,230 pounds, whichever comes first. A generator may accumulate waste up to 270 days if the waste will be transported 200 miles or more.

Remember, you are responsible for your waste, from the point of generation through proper recycling or disposal.

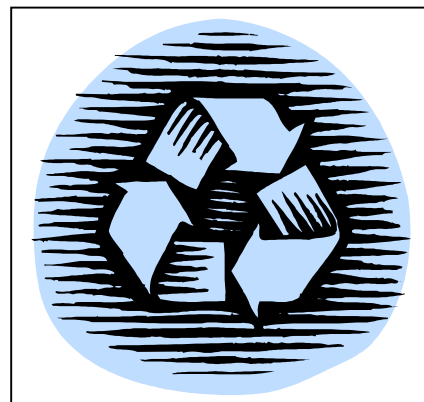
When shipping waste, small quantity generators are required to do the following:

- Prepare and sign a hazardous waste manifest form.**** This form certifies your responsibility for the waste and it must accompany all hazardous waste shipments. Be sure to route the necessary copies as directed and keep copies for your records. Your signature on this form also certifies that you have provisions in place to reduce your hazardous waste generation.
- Comply with land disposal requirements, which may include a requirement that your waste must be treated before it is landfilled.
- Arrange with a State of Wisconsin licensed hazardous waste transporter to take your waste to a licensed treatment, storage, recycling, or disposal facility. Your licensed transporter may be able to help you with the manifest and land disposal notification paperwork.

Less waste means less regulation!!!!!! ☺

DNR wants to hear success stories from businesses of all sizes that are able to reduce their hazardous waste generation and save money simultaneously. Other companies might benefit from your experiences. Wisconsin also supports several recognition awards for businesses that generate less waste.

Many waste reduction options are available. Contact your local DNR hazardous waste specialist for details. (See next page.)



NOTES

* Wisconsin's hazardous waste regulations are contained in chap. NR 600-685, Wisconsin Administrative Code, available on the Web at http://www.dnr.state.wi.us/org/aw/wm/information/wia_cssh.htm

Or contact a waste management specialist from the above list.

** How to apply for an EPA ID number (Pub. WA 101-98). See http://www.dnr.state.wi.us/org/aw/wm/publications/hazard/wa_101.pdf

*** "Satellite accumulation" is a regulatory provision that allows a generator to collect hazardous waste, often generated slowly, in containers at or near the place that the waste is generated. This may be done without having the clock start ticking on the regulatory accumulation time until a reasonable amount (up to a limit of one drum, or 55 gallons) has been collected.

**** How to get a EPA hazardous waste manifest form (Pub. WA-102-98). See http://www.dnr.state.wi.us/org/aw/wm/publications/hazard/wa_102.pdf

Wisconsin Department of Natural Resources

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For more information, look up the DNR Bureau of Waste Management's website at

<http://www.dnr.state.wi.us/org/aw/wm/index.htm>

Or contact the waste management staff at these DNR regional offices:

- Northeast Region, Green Bay
920/492-5800
- Northern Region, Rhinelander
715/365-8900
- Northern Region, Spooner
715/635-2101
- Southcentral Region, Fitchburg
608/275-3266
- Southeast Region, Milwaukee
414/263-8500
- West Central Region, Eau Claire
715/839-3700

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